

EXHIBIT B

Guerrier, Pascale

From: Gulay, Erol <egulay@debevoise.com>
Sent: Thursday, September 9, 2021 9:52 AM
To: Guerrier, Pascale; Zornberg, Lisa; 'Tatz, Nicole'; 'Levander, Samuel'; 'mflumenbaum@paulweiss.com'; 'mgertzman@paulweiss.com'; 'Dearborn, Meredith (mdearborn@paulweiss.com)'; 'Linsenmayer, Robin (rlinsenmayer@paulweiss.com)'; 'Bunting, Kristina' (kbunting@paulweiss.com); 'mkellogg@kellogghansen.com'; 'rfigel@kellogghansen.com'; 'Oppenheimer, Bradley E. <boppenheimer@kellogghansen.com> (boppenheimer@kellogghansen.com)'; 'Pfeffer, Eliana M. (epfeffer@kellogghansen.com)'; 'White, Collin R.' (cwhite@kellogghansen.com); Gressel, Anna; Ford, Christopher S.; Ceresney, Andrew J.; 'Solomon, Matthew'; 'Janghorbani, Alexander'; 'Bamberger, Nowell D.'
Cc: Daniels, Jon; Moye, Robert M.; Hanauer, Benjamin J.; Stewart, Ladan F; Waxman, Daphna A.; Tenreiro, Jorge; Sylvester, Mark; Goody, Elizabeth; Augustini, Hope Hall
Subject: RE: Document Production-Recordings

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Pascale,

This is the first time that the SEC has sought production of the recorded meeting referenced in the document produced at RPLI_SEC 0866480, which was produced to the SEC more than two months ago, on July 2. The meeting was not a quarterly all-hands meeting and does not otherwise come within the scope of any of the SEC's other recording requests. Further, none of the 33 custodians are custodians of the recording, and the meeting name as it appears in Ripple's records does not suggest that the meeting is potentially responsive. As this is the first time the SEC has requested this particular recording, and as the fact discovery period ended last week, on August 31, the SEC's request is dilatory and improper.

Nevertheless, in a good faith effort to achieve a reasonable compromise without further burdening the Court on yet another discovery-related matter, Ripple agrees to review the recording and to produce it to the extent it is responsive and not privileged. Ripple's agreement to produce the recording should not be construed as a waiver of our rights to oppose future SEC discovery requests on the ground that the fact discovery period has expired. Ripple reserves all other rights.

Thanks,
 Erol

From: Guerrier, Pascale [mailto:guerrierp@SEC.GOV]
Sent: Wednesday, September 08, 2021 10:02
To: Zornberg, Lisa; Gulay, Erol; 'Tatz, Nicole'; 'Levander, Samuel'; 'mflumenbaum@paulweiss.com'; 'mgertzman@paulweiss.com'; 'Dearborn, Meredith (mdearborn@paulweiss.com)'; 'Linsenmayer, Robin (rlinsenmayer@paulweiss.com)'; 'Bunting, Kristina' (kbunting@paulweiss.com); 'mkellogg@kellogghansen.com'; 'rfigel@kellogghansen.com'; 'Oppenheimer, Bradley E. <boppenheimer@kellogghansen.com> (boppenheimer@kellogghansen.com)'; 'Pfeffer, Eliana M. (epfeffer@kellogghansen.com)'; 'White, Collin R.' (cwhite@kellogghansen.com); Gressel, Anna; Ford, Christopher S.; Ceresney, Andrew J.; 'Solomon, Matthew'; 'Janghorbani, Alexander'; 'Bamberger, Nowell D.'